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Attorneys for Defendant

GOOGLE LLC

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, *et al.* individually and on  
behalf of all others similarly situated,

Plaintiff,

v.

GOOGLE LLC, *et al.*,

Defendant.

Case No. 3:20-CV-04688 RS

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF  
GOOGLE LLC'S REPLY IN SUPPORT  
OF ITS MOTION FOR SUMMARY  
JUDGMENT**

Date: July 25, 2024

Time: 1:30 p.m.

Courtroom: 3, 17th Floor

Judge: Hon. Richard Seeborg

Action Filed: July 14, 2020

Trial Date: February 10, 2025

1 I, EDUARDO E. SANTACANA, declare that:

2 1. I am an attorney licensed to practice law in the State of California and am a partner  
3 with the law firm of Willkie Farr & Gallagher LLP, located at 333 Bush Street, 34<sup>th</sup> Floor, San  
4 Francisco, California 94104, counsel for Defendant Google LLC (“Google”) in the above-captioned  
5 action. Unless otherwise stated, the facts I set forth in this declaration are based on my personal  
6 knowledge or knowledge I obtained through my review of corporate records or other  
7 investigation. If called to testify as a witness, I could and would testify competently to such facts  
8 under oath.

9 2. I submit this declaration in support of Google’s Reply in Support of its Motion for  
10 Summary Judgment filed herewith.

11 3. Around December 31, 2020, I informed Plaintiffs that to provide the data they  
12 requested associated with their Google Accounts, Google required Plaintiffs’ specific Google  
13 Account IDs and/or email addresses. Attached hereto as **Exhibit A** is a true and correct copy of the  
14 correspondence from myself to Plaintiffs’ counsel, dated December 31, 2020.

15 4. By March 11, 2021, Plaintiffs had been informed that Google could not use Google  
16 Account IDs or other identifying information to look up app activity data generated on their devices  
17 while they had WAA off because Google does not associate WAA-off data with Google Accounts.  
18 To look up WAA-off data, Google would need Plaintiffs to provide a pseudonymous identifier  
19 obtained directly from their devices. On May 7, 2021, Google provided further instructions on  
20 identifying and providing the pseudonymous identifier. Attached hereto as **Exhibit B** is a June 9,  
21 2021 letter from myself to Plaintiffs’ counsel delineating these efforts.

22 5. On or around October 29, 2021, after months of follow-up conferences and  
23 correspondences, Plaintiffs provided the pseudonymous identifiers from their devices that would  
24 “permit Google to locate Plaintiffs’ app instance identifiers and retrieve their associated GA for  
25 Firebase app measurement logs.” Attached hereto as **Exhibit C** is a true and correct copy of  
26 correspondence from Plaintiffs’ counsel to Google’s counsel regarding Plaintiffs’ pseudonymous  
27 identifiers.

1           6. Attached hereto as **Exhibit D** are true and correct excerpts from the deposition  
2 transcript of Christopher Ruemmler dated September 9, 2022.

3           7. Attached hereto as **Exhibit E** are true and correct excerpts from the deposition  
4 transcript of Arne De Booij dated February 7, 2023.

5           8. Attached hereto as **Exhibit F** are true and correct excerpts from the deposition  
6 transcript of JK Kearns dated February 17, 2023.

7           9. Attached hereto as **Exhibit G** are true and correct excerpts from the deposition  
8 transcript of Steven Ganem dated October 28, 2022.

9  
10           I declare under penalty of perjury under the laws of the United States that the foregoing is  
11 true and correct.

12  
13 Dated: June 13, 2024

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/s/ *Eduardo E. Santacana*  
Eduardo E. Santacana